

COLLECTIVE

EXHIBIT B

DeDe Gibby

Subject: FW: Follow up

From: Robert MacGill <robert.macgill@macgilllaw.com>
Sent: Tuesday, June 13, 2023 4:43 AM
To: Kathy Klein <KKlein@rjfirms.com>
Cc: Andy Goldstein <agoldstein@colelawgroupcc.com>; John Jacobson <Jacobson@rjfirms.com>; Patrick Sanders <patrick.sanders@macgilllaw.com>; Scott Murray <Scott.Murray@macgilllaw.com>; Steve Mintz <mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>
Subject: Follow up

Kathy,

I am sorry I did not call you yesterday. I had many flight delays in travel yesterday.

In your June 5 email, you stated the following: "In speaking with Judge Frensley's courtroom deputy about possible dates/times for the discovery conference, she stated that the Judge would like for us to have an "informal" phone call with him prior to filing the joint statement of issues in dispute." Based on this communication, we do not think it is appropriate to file a joint statement until Judge Frensley or his deputy directs otherwise.

If you proceed with a unilateral and without the informal call prior to filing, please include the following statement: "On June 5, Defense counsel notified Plaintiff's counsel regarding our communications with Judge Frensley's deputy and the Court's directive that the parties have an "informal" call with the Court prior to filing a joint statement of the issues in dispute. Plaintiff's counsel indicated that, until the parties hold the requested "informal call" or the Court provides different guidance, Plaintiff does not agree that it is appropriate to file a joint statement at this time. If Guidepost elects to move forward with a unilateral filing, Plaintiff's counsel asked Defense counsel to indicate in any such filing that Plaintiff opposes the requested stay and will be happy to discuss his reasons for this opposition at any time convenient to the Court."

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DeDe Gibby

Subject: FW: Hunt v. Southern Baptist Convention, Case No. 3:23-cv-00243
Attachments: 2023.06.08 Joint Discovery Statement.docx

From: Kathy Klein
Sent: Thursday, June 8, 2023 12:26 PM
To: robert.macgill@macgilllaw.com; Scott Murray <scott.murray@macgilllaw.com>; agoldstein@colelawgroupcc.com
Cc: Steve Mintz <Mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>; John Jacobson <JJacobson@rjfirm.com>
Subject: RE: Hunt v. Southern Baptist Convention, Case No. 3:23-cv-00243

Rob, Scott and Andy:

Judge Frensley's chambers has not yet responded to my email request or follow up voice mail for dates/times for the informal conference relating to the discovery stay. To get this process moving, we would like to go ahead and file the Joint Discovery Dispute Statement. I have attached a draft, which allows for Plaintiff's Statement of Issues to be added. Let me know if you have any concerns relating to the opening paragraph, and please add your statement of the issues. If at all possible, we would like to file this Joint Statement no later than Monday of next week.

Kathy



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From: Kathy Klein
Sent: Monday, June 5, 2023 10:59 AM
To: robert.macgill@macgilllaw.com; Scott Murray <scott.murray@macgilllaw.com>; agoldstein@colelawgroupcc.com
Cc: Steve Mintz <Mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>; John Jacobson <JJacobson@rjfirm.com>
Subject: Hunt v. Southern Baptist Convention, Case No. 3:23-cv-00243

All:

Thank you for taking the time for the call last week regarding the proposed discovery stay. We've discussed the matter and appreciate your willingness to find a middle ground, but we do not believe a staggered schedule or limited production is feasible. We intend to move forward with our motion to stay.

Pursuant to the case management order, before filing a discovery-related motion, we are required to file a joint statement of the issues in dispute and have a formal telephonic discovery conference with Judge Frensley. In speaking

with Judge Frensley's courtroom deputy about possible dates/times for the discovery conference, she stated that the Judge would like for us to have an "informal" phone call with him prior to filing the joint statement of issues in dispute. To facilitate that phone call, she has asked that we email chambers notifying him of the dispute. I will do so this morning and copy all counsel on the communication.

Kathy



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